

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

MICHAEL J DANIELS, ET AL.,

*Plaintiffs,*

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**5-19-CV-01280-RBF**

VS.

AETC II PRIVATIZED HOUSING, LLC,  
AETC II PROPERTY MANAGERS, LLC,  
HUNT ELP, LTD,

### *Defendants.*

## DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS TO PROPOSED JURORS

Defendants submit their proposed questions for the Court's voir dire examination to the prospective jurors:

#### A. Experience with the Legal System

- a. Anyone have any training or work experience in the legal field?
- b. Does anyone here have a lawyer in their family?
- c. Have you ever retained an attorney?
  - i. Was your experience retaining an attorney positive or negative?
- d. Has anyone ever served on a jury before?
  - i. What type of case?
  - ii. Verdict reached?
  - iii. Were you the foreperson?
  - iv. Were you satisfied with the process/experience?

## B. Landlord/Tenant Relationship

- a. Some of you indicated on your questionnaires that you had experience as a landlord?
  - i. Will you tell me about that?
- b. Does anyone's primary occupation involve entering into Lease Agreements?
  - i. What is your occupation?
  - ii. Are you typically the Lessor or Landlord?
  - iii. Are the Lease Agreements negotiated?
  - iv. Are the Lease Agreements forms?
  - v. If Lease terms are on a form and are not negotiated, do you feel that the lease terms are unfair?
  - vi. Do the Lease Agreements you work with place duties on both the landlord and the tenant?
  - vii. Do you allow or require tenants to inspect the property at or before occupancy?

- viii. Do you make all repairs requested based on the inspection?
- ix. Has any tenant broken a lease? Reason?
- x. Ever have a tenant file a complaint or dispute? Reason? Was it resolved to your satisfaction?
- c. How many of you have been tenants before?
  - i. Has anyone had to break lease? Reason?
  - ii. Has anyone had repairs that the landlord didn't make?
  - iii. Has anyone felt that their landlord breached the lease?
    - 1. What was the basis for the claimed breach?
    - 2. Were you satisfied with the outcome/result?

**C. Military Experiences**

- a. A number of you indicated that either you or a family member were members of the military. How many of you personally served in the military?
  - i. How long? Which branch? What positions/ranks?
  - ii. Where stationed?
  - iii. Did you ever live on base housing?
  - iv. What are your feelings about base housing?
- b. Now, which of you indicated that you had family members who served in the military?
  - i. How long? Which branch? What positions/ranks?
  - ii. Where stationed?
  - iii. Did they ever live on base housing?
  - iv. Did you visit their base housing?
  - v. What are your feelings about your family members' base housing?
- c. Anyone been out to Randolph AFB?
- d. Anyone been inside the historic homes available for military members and their family?
  - i. What were your impressions.
- e. Do you have an opinion on whether the homes were in good order and repair?
- f. Do you have an opinion on whether the homes were safe, clean and habitable?

**D. Mold**

- a. There will be some testimony in this case about mold.
- b. Mold is everywhere, indoors and outdoors, but some people can be allergic to mold. Is anyone here allergic to mold?
- c. Has anyone experienced a health complaint related to mold?
- d. Has anyone experienced mold in your home that required professional cleaning?
- e. Has anyone had enough visible mold in their home that they were concerned?
  - i. What did you do?
  - ii. How did the situation resolve itself?
  - iii. Were you satisfied?
- f. Has anyone had a family member who experienced a health complaint related to mold?
- g. Has anyone had a family member experience mold in their home that required professional cleaning?
- h. Has anyone had a family member who had enough visible mold in their home that they were concerned?

- i. What did they do?
- ii. How did the situation resolve itself?
- iii. Were they satisfied?

E. Conclusion

- a. Anyone feel that this case just isn't right for you because of some relevant experience or because of an opinion or belief that you hold?